

AO 91 (Rev. 11/11) Criminal Complaint

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**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

Antonio Brewer

Case No. Case: 2:23-mj-30084  
Assigned To : Unassigned  
Assign. Date : 3/2/2023  
USA V. BREWER (CMP)(CMC)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 29, 2022, and February 28, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(g)(1)

*Offense Description*  
Felon in Possession of a Firearm

This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: March 2, 2023

City and state: Detroit, MI

  
*Complainant's signature*

Randall B. Olsen, Special Agent, ATF  
*Printed name and title*

  
*Judge's signature*

Hon. Kimberly G. Altman, United States Magistrate Judge  
*Printed name and title*

**ADDIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Randall B. Olsen, being first duly sworn, hereby depose and state the following:

**INTRODUCTION**

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), United States Department of Justice since May 2022. I am currently assigned to Detroit Group VII, investigating various federal firearm violation. Prior to being employed as a Special Agent, I was a Police Officer with the Detroit Police Department (DPD), for over seven (7) years, and the Grosse Pointe Park Department of Public Safety (GPPDPS), for over one (1) year. During that time, I was assigned to DPD's Special Operations unit, as well as the Special Repose Team (SRT). I am a graduate of the ATF Special Agent Basic Training program and of the Detroit Police Department's Police Academy. I have also earned a Bachelor of Science in Criminal Justice with a concentration in Supervision and Management. During my employment with ATF, DPD, and GPPDPS, I have participated in numerous criminal investigations focused on firearms, armed drug trafficking violations and criminal street gangs. I have also investigated violations of Title 18, United States Code, Section 922(g)(1), Felon in Possession of a Firearm.

2. I make this affidavit from personal knowledge based on my participation in this investigation, as well as information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all details or facts that exist pertaining to the investigation. As set forth below, probable cause exists that Antonio BREWER (DOB 01/XX/1986) violated 18 U.S.C. § 922(g)(1) (felon in possession of a firearm) on or about July 29, 2022, and February 28, 2023, in the Eastern District of Michigan.

### **PROBABLE CAUSE**

3. On July 29, 2022, the Detroit Police Department (DPD) conducted a traffic stop of a tan 2003 Buick Century DPD then arrested the driver and registered owner, Antonio BREWER, who had an active felony arrest warrant out of Detroit. During the inventory search of the vehicle, DPD recovered a loaded black Taurus, Model: G2C, Caliber: 9mm, Serial: ABG641616, and a Ziploc bag containing suspected Methamphetamine, suspected Heroin, suspected Crack Cocaine, and suspected Ecstasy. The loaded handgun was located under the driver's seat and the suspected narcotics were located in the back seat. As the DPD officer removed the gun

and drugs from the vehicle, BREWER stated, "Where did all that come from. The crack and the gun is mine. But not that other stuff what is that?"

4. On February 28, 2023, DPD detained a silver 2021 Toyota Camry for being improperly parked. BREWER was arrested from the driver's seat of the vehicle for having active misdemeanor arrest warrants out of Detroit. Prior to his arrest, officers observed BREWER reaching down and to his left in the vehicle. During the inventory search of the vehicle, DPD located a black Taurus, Model: G2C, Caliber: 9mm, Serial: ABG669658, that was loaded and located in the side pocket of the driver's door in the general area that the officers had seen him reaching.

5. A review of the Law Enforcement Information Network (LEIN) computer printout regarding Antonio BREWER's criminal history record revealed the following convictions:

- 2008 – Felony – Controlled Substance – Create/Deliver Counterfeit (Narcotic/Ecstasy).
- 2009 – Felony – Two Counts of Controlled Substance – (1) Delivery/Manufacture (Cocaine, Heroin or another Narcotic) Less than 50 Grams, (2) Delivery/Manufacture – Ecstasy/MDMA.

6. Subsequently, on March 1, 2023, Special Agent and Interstate Nexus Expert Kevin Rambus advised me, based on a verbal description and without physically examining the firearms, that the firearms in question were manufactured outside the state of Michigan and therefore had traveled through interstate and/or foreign commerce.

### CONCLUSION

7. Probable cause exists to believe that Antonio BREWER, having been previously convicted of at least one felony, did knowingly and intentionally possess both firearms that had previously traveled in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

Respectfully submitted



Randall B. Olsen, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms, and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means.



Hon. Kimberly G. Altman  
United States Magistrate Judge

Date: March 2, 2023